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February 19, 2021

Honorable Joseph H. Rodriguez, U.S.D.J.
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Street
Camden, NJ 08101

Re: Estate of Jon Leon Watson, et. al. v. Cumberland County, et. als.
Docket No. 1:16-cv-06578

Dear Judge Rodriguez:

In reference to the above captioned matter, Plaintiffs respectfully request your Honor to please set aside at this time, the Rule 60(b) Motion presently pending before this Court.

As your Honor may recall, the Estate of Jon Leon Watson's matter is one of seven cases involving inmate suicides that took place at the Cumberland County Jail from July, 2014 through November, 2018. Four of the cases, including Watson, already have had dispositive motions decided for which Rule 60(b) Motions have been filed.

On February 17, 2021 all interested parties met with the Honorable Ann Marie Donio to discuss proceeding with settlement conferences for a possible global resolution of all cases involving these suicides. In accordance therewith, it was decided that following a short briefing schedule, the parties will meet with Judge Donio on March 26, 2021 for settlement discussions.

It was suggested by Judge Donio and Plaintiffs agree, to request that this Court delay its consideration of the pending Rule 60(b) Motion on its merits, to allow the parties to explore the amicable resolution of all relevant matters. We believe this will best serve all parties involved.

If your Honor is agreeable to grant this request, I have been asked to request that a text order be entered to advise all counsel of same.

Thank you for your attention and extended courtesies in this matter. Should you have any questions, please do not hesitate to contact me directly.

Respectfully submitted,

CONRAD J. BENEDETTO, ESQ.

cc:

VIA FACSMILE

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Honorable Ann Marie Donio

Honorable Robert B. Kugler

In Re: Estate of Alissa Allen v. Cumberland County, et als.

Case No.: 1:15-cv-06273

Estate of David Hennis v. Cumberland County, et als.

Case No.: 1:16-cv-04216 (JBS)(AMD)

Estate of Robert Wayne Lewis v. Cumberland County, et als.

Case No.: 1:15-cv-03503 (JBS)(AMD)

VIA ELECTRONIC FILING

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